

SLARSKEY LLC / 767 Third Avenue, 14<sup>th</sup> Floor / New York, NY 10017

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Richard Weingarten  
(212) 658-0661  
rweingarten@slarskey.com

December 23, 2022

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Jane Doe v. Telemundo Network Group LLC, et al.*, 22 Civ. 7665 (JPC)(KHP)

Dear Judge Cronan:

We are counsel to Defendant Rafael Ortega (“Ortega”) in the above-referenced action. We write pursuant to Rule 4(B)(ii) of Your Honor’s Individual Rules and Practices to request that Ortega be permitted to file: (1) a redacted version of his brief in opposition to Plaintiff’s motion to proceed anonymously (“Motion”) (*see* ECF No. 35); (2) a redacted version of the attorney declaration filed in support of Ortega’s opposition to the Motion; and (3) sealed versions of certain exhibits related thereto. The scope of Ortega’s proposed redactions and sealed filings is narrow, limited only to: (1) explicit references to Plaintiff’s identity; (2) URL links or exhibit descriptions; and (3) substantive exhibits, all of which will make public, or tend to reveal, Plaintiff’s identity.

Ortega only seeks to file these documents with redactions and/or under seal because undersigned counsel presumes, given the nature of the Motion, that would be Plaintiff’s preference. Undersigned counsel contacted Plaintiff’s counsel by email on December 20, 2022 to advise him of Rule 4(B)(ii) of Your Honor’s Individual Rules and Practices and to confirm that it was, indeed, Plaintiff’s preference that Ortega make the within request. As of this filing, however, Plaintiff’s counsel had not responded. Regardless, in an abundance of caution, and in order to ensure that Plaintiff’s counsel has ample opportunity prior to Ortega’s opposition deadline on January 6, 2023 to file a letter as contemplated by Rule 4(B)(ii) explaining the need to redact Ortega’s filings and/or file certain exhibits under seal, Ortega makes the within request.

We thank the Court for its time and consideration of the matters within.

Respectfully submitted,



Richard Weingarten

Cc: All counsel (via ECF)